POINT 2 SURVEYORS LTD 17 SLINGSBY PLACE, LONDON WC2E 9AB

TEL: 0207 836 5828



JUSTIN BOLTON • BARRY HOOD

• Andrew Cartmell • Chris Skelt •

NICK LANE • LIAM DUNFORD

Mr. James Huish Montague Evans LLP 5 Bolton Street London W1J 8BA

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BY EMAIL: james.huish@montagu-evans.co.uk

Dear James,

PROPOSED DEVELOPMENT – JACK STRAW'S CASTLE – APPLICATION RESPONSE INTERNAL DAYLIGHT AMENITY TO PROPOSED UNITS

We are instructed to respond to the Case Officer's query in relation to the above proposed development:

"The basement rooms appear to have very poor light and outlook; they fail to comply with our CPG2 Housing requirement for such rooms to have glazing equal to 10% of their floor area unobstructed by a 30 degree line; I note that your daylight report shows that they achieve 1.5% ADF (noting that kitchens should achieve 1%) which I find difficult to believe, given the narrowness of the lightwell, small windows and large deep floorplans."

Whilst the basement rooms may not comply with the CPG2 Housing requirement for such rooms to have glazing equal to 10% of their floor area unobstructed by a 30 degree line, simple geometric guidance of this nature should be treated as rule-of-thumb. It may give an indication as to whether there will be good amenity within a space, but it should not take precedence over detailed calculations that quantify the internal light levels.

The CPG2 guidance in relation to basement rooms has significant limitations - first, it only accounts for external obstruction by simple section, and second it does not account for either the nature of the glazing, or the internal finishes within the space. These factors all have a significant bearing on daylight levels within a space.

We note that section 4.21 of the CPG2 guidance states that, "All habitable rooms should have access to natural daylight ... Developments should meet site layout requirements set out in the Building Research Establishment (BRE) Site Layout for Daylight and Sunlight – A Guide to Good Practice (1991)[2011]."

Correctly applying the BRE Guidelines we have calculated the Average Daylight Factor (ADF) for each room. The ADF methodology is detailed in Appendix C of the 2011 BRE Report, and also in British Standard 8206 Part 2:2008. Following this methodology we have determined that both basement rooms will achieve the 1.5% target for a Living Room. Our analysis is based upon double glazing with a transmittance of 0.68, and have allowed for a maintenance factor of 8% (which is appropriate for urban residential properties).

We trust this letter clarifies the Case Officer's query however if we can be of any further assistance please do not hesitate to contact us.

Yours sincerely,



Senior Surveyor For and on behalf of Point 2 Surveyors Ltd.

Matt.Hensey@point2surveyors.com

